

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
FLORENCE DIVISION

UNITED STATES OF AMERICA	)	CRIMINAL NO.: 4:21-CR-00241-SAL
	)	
vs.	)	
	)	
DOMINIQUE DEVONAH BRAND	)	<b><u>NOTICE OF INTENT TO USE</u></b> <b><u>EVIDENCE UNDER RULE 404(b)</u></b>

The United States of America hereby gives notice to the Defendant that testimony and other evidence of the following may be elicited during the trial and may be admissible as direct evidence of the crimes charged and/or pursuant to other authorities including Fed. R. Evid. 404(b):

Evidence related to the burglaries of the Little Bethel Baptist Church, 3811 Bluff Road, Mullins, South Carolina, on or about February 14, 2021 (laptop stolen), and March 26, 2021 (church van stolen);

Evidence related to the burglary of the J.D. Jackson Clubhouse, 204 Pee Dee Island Road, Nichols, South Carolina, on or about March 23, 2021 (.22 rifle, 12-gauge shotgun, and ammunition and foodstuffs stolen);

Evidence related to the recovery of the .22 rifle (stolen from the Jackson Clubhouse) on Bluff Road, Mullins, South Carolina, on or about March 24, 2021; and,

Evidence from the Defendant's cellular phone extraction including internet searches, text messages (or messages sent over other applications such as Facebook Messenger), phone call records, and other usage in the days preceding and following the crimes charged and the other relevant events identified herein.

This filing is intended to provide notice of the general nature of evidence the Government may introduce that could be considered as evidence of other crimes, wrongs, or acts, and may be used to prove matters such as motive, opportunity, intent, preparation, plan, knowledge, identity,

absence of mistake, or lack of accident. Counsel for the Defendant can contact the undersigned if there is any question concerning the specific nature and use of such evidence.

Respectfully submitted,

ADAIR F. BOROUGHS  
UNITED STATES ATTORNEY

By: s/Everett E. McMillian  
Everett E. McMillian  
Assistant U.S. Attorney  
401 West Evans Street  
Florence, South Carolina 29501  
843-667-3991  
everett.mcmillian@usdoj.gov

Kathleen Stoughton  
Assistant U.S. Attorney  
1441 Main Street Suite 500  
Columbia, South Carolina 29201

Scott Hixson  
Special Assistant U.S. Attorney  
401 West Evans Street  
Florence, South Carolina 29501

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